

1 has greater access to capital markets at a national level giving it greater liquidity
2 and thus a lower cost of equity.

3

4 Q. Item #8 on Attachment #3 discusses changing the default factor for Network
5 Operations Expense. Would you discuss why you are proposing a change in this
6 item.

7 A. Yes. Network Operations Expense encompasses the following accounts in the
8 Uniform System of Accounts:

9	Network Operations Expense	6530
10	Power Expense	6531
11	Network Administration Expense	6532
12	Testing Expense	6533
13	Plant Operations Administration Expense	6534
14	Engineering Expense	6535

15

16 Expenditures in these areas for small companies differ significantly from larger
17 companies. For example, the plant administration expense account includes the
18 cost of overall supervision of plant operations, including overall planning,
19 developing methods and procedures, developing plant training and coordinating
20 safety programs. The account excludes immediate or first level supervision which
21 is included in the plant specific accounts. In most small companies, the second
22 level of supervision is the company manager, consequently, most small
23 companies have very little plant administration expense. Engineering expense is
24 generally less in small companies since most engineering is on a specific project
25 basis rather than of a general nature. Network administration activities in small
26 companies do not include extensive network control facilities because their
27 networks are limited.

1 In the HAI Model, Network Operations Expense is generated based on a
2 composite level of expenses for the ARMIS reporting companies on a per line
3 basis. The model then multiplies this expense level by the Network Operations
4 Expense factor to arrive at a final estimate of Network Operations Expense. The
5 HAI modelers in the default assumptions have assigned this factor a 50% value,
6 essentially indicating that forward- looking Network Operations Expenses
7 would/should be half of the current level. Their rationale for doing this is
8 summarized as follows:

9 "....these costs are artificially high because they reflect antiquated systems
10 and practices that are more costly than the modern equipment and
11 practices that the HAI Model assumes will be installed on a forward-
12 looking basis. Furthermore, today's costs do not reflect much of the
13 substantial savings opportunities posed by new technologies, such as new
14 management network standards, intranets, and the like."

15
16 Because small companies have very different circumstances and do not have
17 many of the systems typical in large companies, it is our belief that the types of
18 forward-looking savings the modelers are anticipating for large companies will
19 not, nor cannot, be achieved in small companies. We are, therefore, proposing
20 that the Network Operations Expense factor be set at 100% rather than 50%. Use
21 of this factor produces modeled Network Operations Expenses that are somewhat
22 less than, but relatively close, to the expenses currently encountered by the small
23 Illinois Companies.

24
25 Q. Please describe the changes you made in local number portability cost as
26 described in Item #9, Attachment #3.

1 A. The default inputs assume a cost of \$0.25 per line per month to recover the cost of
2 implementing local number portability. Since none of the small Illinois
3 companies have implemented this function, we have reduced this input to zero.
4 This reduces the calculated USF cost by a similar amount per line.

5
6 Q. Item #10, Attachment #3, describes changes in the Billing and Bill Inquiry input.
7 Would you please describe this input in great detail and your rationale for
8 changing it.

9 A. Yes. This input is intended to capture the customer operations costs of providing
10 local service billing, collecting, bill inquiry and other inquiries regarding the
11 provision of service. The provision of these services differ in a number of
12 respects between large and small companies. Many of the customer contact
13 functions for large companies are performed in centralized centers by relatively
14 large work groups. With these work group sizes, there may be opportunities to
15 adjust the work group to fluctuating workloads on an hourly or daily basis.
16 Billing functions are typically spread throughout the month with multiple billing
17 cycles. Typically, the data processing and bill processing functions are performed
18 with in-house computer assets and in-house personnel.

19
20 In small companies, these functions are generally performed by only a few
21 individuals with staffing required during the normal business hours to provide
22 service availability to customers. There are relatively few opportunities to adjust
23 work group levels to variations in the customer contact workload. Billing is
24 typically performed once a month so there are greater variations in the work flow

1 than in larger companies. Oftentimes, service bureaus are used by small
2 telephone companies, at a minimum, to provide software support and often
3 provides full bill processing functions using investments made by the service
4 bureau. Thus, the expense and investment levels of small companies may vary
5 significantly from larger companies.

6 In order to test the validity of the default assumption, GVNW undertook a study
7 of the customer service expenses of a number of its cost study clients to separate
8 the costs associated with local services and billing from those associated with toll
9 and carrier billing functions. Using cost study information from separations
10 studies, which separate such expenses into a number of different categories by
11 work functions, GVNW developed an average cost per line for those companies
12 of the local billing functions. The results of that study indicated a \$3.62 cost per
13 line for the local billing and customer contact functions. We believe this result is
14 more representative of the cost of these functions in small Illinois companies and
15 have thus incorporated this estimate in the economic cost studies we have
16 performed.

17
18 Q. Item #11, in Attachment #3, relates to carrier-to-carrier billing costs. What is
19 your rationale for changing the default level for this item?

20 A. Carrier-to-carrier billing costs include the ongoing cost of responding to IXO
21 service change requests and the cost of rendering Carrier Access Billing System
22 ("CABS") bills to individual carriers for their use of the local exchange network
23 in providing toll services. These bills are rendered at an individual wire center
24 level to each interexchange carrier, mostly on a monthly basis. With average wire

1 center sizes for the small companies at a significantly smaller level than the
2 average for large Bell Operating Companies, it is not surprising that the cost of
3 this function is different for small companies.

4
5 The default input for this item is \$1.69 per line per year. A study of these costs
6 using data available from a group of the Illinois cost companies' cost separations
7 studies indicated that, on average, these costs are \$16.83 per line per year. This
8 value has been used as the input for this cost item. Within the model, this value
9 only impacts the costs of the access elements and does not affect the local service
10 cost.

11

12 Q. Item #12, Attachment #3, describes changes in the model inputs for central office
13 switching and transmission expense. Please describe the derivation of the default
14 *input values and the values that the IITA has used in its development of forward-*
15 *looking costs.*

16 A. In developing expenses for most of the plant specific expense categories, the HAI
17 Model uses recent ARMIS data from around the country to develop ratios
18 between current expenses and investments as a basis for developing projected
19 forward-looking expense levels. However, in the case of central office switching
20 and transmission expense, this data is overridden by two alternative expense
21 ratios, one for each investment category. The input levels for these items are
22 based on a 1993 incremental cost study performed by New England Telephone

1 Company in New Hampshire and are considerably lower than current levels
2 experienced even by the Bell Operating Companies.
3

4 The IITA inputs are developed based on current ratios of expenses to investment
5 for these expense/investment categories for the small Illinois telephone
6 companies. Since the type of investment included in these accounts is generally
7 reflective of forward-looking technology, it is reasonable to expect that the ratios
8 currently experienced by the Illinois companies are reflective of the forward-
9 looking costs they can expect to experience.

10
11
12 **ECONOMIC COST STUDY RESULTS**
13

14 Q. Using the input changes you have described plus the default inputs for the
15 remaining items, have you completed "economic cost" studies using the HAI 5.0a
16 Model for each of the small companies in Illinois?

17 A. Such studies have been completed under my direction. The results of these
18 studies are summarized in IITA Exhibit #1, Attachment #5. Attachment #5 shows
19 that the monthly USF cost per line varies from a level of \$47.76 to \$273.89 for the
20 individual companies. The weighted average of these costs across all the
21 companies (using actual company access lines) is \$91.67. The weighted average
22 cost is the proxy cost, as that term is used in the statute for the total group of
23 companies.

24
25
26 **AFFORDABLE RATE**
27

1 Q. Have you developed a proposed "affordable rate" for each of the companies?
2 A. Yes, that has also been developed under my direction. Since the time for
3 preparation and prosecution of this case is limited and because the proposal for
4 IUSF funding is ultimately limited by the individual companies' earnings levels
5 on an embedded cost basis, the IITA is proposing that the "affordable rate" be
6 established at the minimum level allowed by the statute--the current rates that are
7 in effect. This will provide a rate within the limits of the statute but will avoid the
8 necessity for a prolonged discussion of alternative methods of determining an
9 "affordable rate". The IITA's proposal is specifically that the affordable rate be
10 established at the current rate level for basic service (including any state carrier
11 common line surcharge rates and EAS rate elements) for the class of service being
12 considered plus any additive rates for touch calling service. To simplify the
13 calculation in my Attachments, the level displayed is the weighted average rate
14 *for residential and business service.*

15
16 Q. The statute requires that before a company may receive support from an IUSF, the
17 company must demonstrate that the economic cost is greater than the affordable
18 rate. Have you demonstrated this for each of the companies?

19 A. Yes, in two different ways. First, in this case, the individually calculated proxy
20 cost for each company exceeds the proposed affordable rate for that company. In
21 addition, the weighted average proxy cost for the combined companies is greater
22 than the weighted average affordable rate for the combined companies, thus
23 demonstrating that the statutory test has been met.

24

1
2 **DETERMINING LEVEL OF SUPPORT**
3

4 Q. The statute requires in determining the level of support to be received that federal
5 support funds received by the companies must be taken into account. Have you
6 performed this analysis?

7 A. Yes, IITA Exhibit #2, Attachment #5, displays the calculation of support amounts
8 using the economic costs that have been developed, the proposed affordable rate
9 and the federal support fund received by the companies.

10
11 Q. Could you explain Attachment #5 in greater detail.

12 A. Yes. Using the actual company access lines and the difference between the
13 economic cost and affordable rate developed in Attachment #5, I have calculated
14 the total potential annual support amount. I have then subtracted from that the
15 federal support funds received by the company to arrive at the IUSF eligibility
16 amount based on an individual company cost determination.

17
18 Q. Please describe in greater detail the amounts included as federal support funds?

19 A. These amounts are calculated from three different sources. First, at the federal
20 jurisdiction, 25% of local loop costs are assigned to the carrier common line
21 (CCL) revenue requirement for cost settlement companies with an equivalent
22 amount being assigned for average schedule settlement companies. Funding for
23 this CCL revenue requirement comes at the federal level from several different
24 sources. These include the federal end user common line charge, or EUCL,
25 carrier common line charges billed to interexchange carriers, the long-term
26 support portion of the federal USF, and net settlements with the National

1 Exchange Carrier Association's CCL pool (either positive or negative) to equal
2 the CCL revenue requirement. The amounts included for the CCL revenue
3 requirement are the latest estimates of 2000 actual amounts. Second, many
4 companies receive federal high cost loop support from the federal USF. These
5 amounts have been included as federal support amounts by annualizing the Fourth
6 Quarter, 2000 amounts posted by the Universal Service Administration Company
7 ("USAC") on their web page. Third, all the small Illinois companies receive
8 federal local switching support from the federal USF. These amounts have also
9 been included by annualizing Fourth Quarter, 2000 estimated amounts posted by
10 USAC on their web page.

11
12 Q. Can you summarize the results of Attachment #5?

13 A. Yes, on an individual company basis, all but four of the companies show some
14 level of need for state USF funding. Using the statutory proxy cost criteria, in
15 summary, the analysis shows a potential IUSF funding support requirement of
16 over \$73 million for the Illinois small companies as a group. This demonstrates
17 that the "economic cost" substantially exceeds the proposed affordable rate and
18 the federal support for the companies as a whole. It further demonstrates that
19 using the proxy cost approach as contained in the statute, the small Illinois
20 companies, as a group, would be eligible for receiving that amount of IUSF
21 funding and that each company should be eligible for such funding.

22
23 Q. Is the IITA proposing that this full funding eligibility be implemented in 2001 or
24 in the future?

1 A. No, it is not. The results of developing the economic cost for the companies,
2 using the forward-looking model and making the other adjustments as required by
3 the statute, produces a result which is well beyond the needs of the small Illinois
4 companies in total. These results emphasize the potential discontinuity between
5 forward-looking costs and the actual embedded costs of the companies. In
6 addition, as discussed earlier in my testimony, results of this analysis, when
7 compared with the analysis that will be presented hereafter, shows the
8 discontinuity that can result for individual companies because of the infirmities of
9 the forward-looking models and techniques.

10

11 As discussed subsequently in my testimony, the rate-of-return showing required
12 by the Commission will determine the size of the fund, the companies qualifying
13 for IUSF support and the amount of the support on an individual company basis.
14 That limitation makes the HAI results virtually meaningless but for the "economic
15 cost" requirements of the statute for the Illinois small companies as a group. In
16 any event, the Commission, the Hearing Examiner and all parties should
17 understand that the IITA is not advocating the creation of an IUSF in the amount
18 set forth on Attachment #5.

19

20 Q. What additional steps is the IITA proposing should be taken in determining the
21 funding to be provided by the IUSF?

22 A. In its November 21, 2000 Order in these dockets, the Commission expressed its
23 intent that IUSF funds should not be provided to companies until some type of
24 showing is made that the company is "in need" of receiving such funding. The

1 clear intent of the Order was to include an evaluation of a company's current
2 earnings position, without IUSF funding, to see whether the company needs such
3 funding to maintain an appropriate earnings level. While such a requirement is
4 clearly not included within the statutes dealing with the IUSF, the IITA
5 understands that such a test will be conducted to determine the level of IUSF
6 funding a company can receive. This is being done to comply with the
7 Commission's expressed desires and to provide the information the Commission
8 has indicated it needs in order to implement an IUSF.

9
10 Q. How will this be done?

11 A. The IITA and the Staff have held extensive discussions to develop a simplified
12 process for conducting such an analysis within the time constraints of this
13 proceeding. As a result of these discussions, the IITA and the Staff are near
14 agreement on a simplified filing process and form based primarily on data
15 available from a company's annual financial report that will demonstrate the
16 funding need a company may have for IUSF funding to maintain a reasonable
17 rate-of-return. The IITA and Staff have also arrived at an agreed upon rate-of-
18 return for the small companies to use for this determination.

19
20 Q. Can you describe the general process being discussed by the Staff and the IITA.

21 A. Yes. The process and form that have been agreed to is the development of an
22 individual company revenue requirement based on a simplified procedure which
23 is contained in the form developed by the two parties. Generally, it is based on
24 actual total company 2000 financial results as reported to the Commission on

1 Form 23A or other suitable annual financial reports acceptable to the
2 Commission. Included in the form are the opportunity to make certain
3 adjustments to the results to reflect known changes to the financial results. The
4 form also includes an adjustment to remove the support amounts received during
5 2000 from the IUSF and from the DEM Weighting Fund. The form compares the
6 company's embedded cost revenue requirement with the return level agreed to
7 between the Staff and the IITA and calculates the funding needed from the IUSF
8 in the future to achieve this reasonable return. That amount would be the amount
9 of IUSF funding that the company would be entitled to under the new IUSF fund.

10
11 Q. You indicated that there is an agreement between the Staff and the IITA regarding
12 the return on rate base level that should be used in making this calculation. Can
13 you describe that agreement.

14 A. Yes. The IITA and Staff discussed the major elements that go into determining a
15 rate-of-return on rate base. Because of the limited time to complete this
16 proceeding before the DEM Weighting Fund expires, the two parties agreed that it
17 would be prudent to arrive at a rate-of-return that could be used for all the
18 companies based on general financial parameters rather than detailed studies of
19 each company's specific circumstances. After a number of discussions, the two
20 parties agreed upon a set of factors that would be used to determine the rate-of-
21 return. These included a hypothetical capital structure of 40% debt and 60%
22 equity, a current cost of long term debt of 9% based on current Rural Telephone
23 Finance Corporation quoted lending levels, and a cost of equity of 15% and
24 13.8% for the non-Frontier small companies and Frontier companies respectively.

1 It was also agreed that since the form developed to evaluate the earnings did not
2 include interest cost in the calculation of income taxes that an after tax cost of
3 debt would be used in calculating the overall rate-of-return to be used in the
4 earnings analysis form.

5
6 Q. How do you see this analysis being presented in determining the IUSF funds that
7 should be provided to the small companies under the new IUSF?

8 A. It is my understanding that each of the companies that desire to receive funding
9 from the new IUSF would need to complete the earnings evaluation form and
10 demonstrate that on an embedded cost basis their earnings, absent the receipt of
11 the current IUSF and DEM Weighting Funds they receive, would be less than the
12 agreed upon overall rate-of-return. Such companies would be eligible to receive
13 IUSF from the new fund sufficient to bring them to the agreed upon earnings
14 level.

15
16 Q. Are you presenting evidence regarding the companies who will be requesting
17 IUSF from the new fund and the overall amount of the fund?

18 A. Not at this time. The agreed upon procedure is based upon the annual financial
19 report to the Commission. In order to provide the latest available data, the parties
20 have agreed to a procedural schedule, which would have this data filed on April
21 20, 2001, shortly after many companies file Form 23A with the Commission. The
22 earnings analysis can thus be based on year 2000 data. Individual companies
23 eligible for and desiring to request funds from the new IUSF will be submitting

1 the appropriate data in an April 20, 2001 filing in these dockets. I will be
2 providing a summary of the requested amounts at that time.

3
4 Q. I presume then that you cannot provide any hard data at this time on the size of
5 the new IUSF fund. Do you have an idea regarding the potential size of the fund?

6 A. While you are correct that I do not have hard data at this point in time, some
7 preliminary analysis was done using 1999 data and an earnings evaluation process
8 similar to that agreed upon with the Staff. Based on that analysis, I expect that
9 while many companies will be requesting IUSF funding, others will probably not.
10 Furthermore, based on that analysis, I would anticipate that the requested funding
11 will be less than the current IUSF funding levels.

12
13 Q. Are there actions during the duration of these dockets that could change this
14 analysis?

15 A. The primary thing I can think of would be a significant change in the companies'
16 access rates as a result of the current policy of mirroring federal rates combined
17 with some significant change in federal access policies. Currently, the FCC has
18 under consideration two major proposals that could cause significant changes in
19 federal access rates. Both the RTF Recommendation and the Multi-Association
20 Group ("MAG") proposals before the FCC contain provisions for reducing federal
21 access charges with an offset to the lost access revenues from increases in federal
22 universal service funds. Should either of these proposals be adopted with a
23 resulting significant reduction in federal access charges and with intrastate access
24 rates reduced pursuant to the current mirroring policy, companies' earnings levels

1 could be significantly impacted. While I do not anticipate this occurring before
2 the April 20, 2001 filing date, there is a good possibility that the FCC's review of
3 the RTF Recommendation will be completed while these dockets are in progress.

4
5 Q. Is the IITA concerned about the potential impacts that such changes could have
6 on the small Illinois telephone companies?

7 A. It certainly is. Consideration has been given and discussed with the parties on
8 how best to address this issue in Illinois. There has been no agreement regarding
9 the best way to do that, although several parties have expressed significant
10 concerns about addressing it in these dockets. The IITA is not specifically
11 addressing a proposed solution to this potential problem at this time and is
12 continuing to consider how it should be addressed before the Commission. The
13 IITA does, however, want to put both the Commission and the parties to this case
14 on notice that if such a change in state access charges would result from changes
15 in federal access rate policies, the resulting financial impacts, using the
16 procedures discussed above to determine the IUSF funding in response to
17 expressed policies of the Commission could directly impact the future size of the
18 IUSF and/or require a different solution.

19
20 Q. Once the IUSF funding amounts are developed in this proceeding, does the IITA
21 have recommendations as to how often these amounts should be reviewed?

22 A. Yes. We would recommend that, in general, they be reviewed relatively
23 infrequently, such as on a three to five year timetable. This will limit the
24 administrative and litigation costs that could be involved in a more frequent

1 update process. It would provide stability to the companies and an environment
2 favorable to investment in new facilities since revenue streams would be stable
3 over a mid-range time period. For the payers into the fund, it would provide
4 relative stability in the amount of funding that would be required and would also
5 limit the administrative and litigation costs associated with maintaining the fund.

6
7 Q. Are you proposing that the fund be frozen during this three to five year time
8 period?

9 A. No. Since the funding is being limited to amounts necessary to achieve a
10 reasonable rate-of-return, if industry policy changes at either the state or federal
11 level cause changes in the companies' revenue streams, this proceeding should be
12 reopened or a further proceeding should be held to evaluate future IUSF funding
13 in light of the changed circumstances. A significant change in state access rates
14 as a result of changes in federal or state access rate policies could trigger such a
15 reevaluation, for example.

16
17 Individual companies may have changes in circumstances impacting their overall
18 earnings during this time period that would provide an appropriate rationale for a
19 company on an individual basis to seek a modification in USF funding. In light of
20 the rate-of-return constraint being imposed in this proceeding, the companies so
21 affected must have the right to make the necessary filings to have their change
22 and circumstances addressed. I would contemplate that such a request would be
23 conducted before the Commission in a manner that would allow all affected

1 parties to participate with regard to the determination of the companies' IUSF
2 needs and the overall impact on the IUSF funding.

3
4 **IMPLICIT SUBSIDY REQUIREMENT**

5
6 Q. You indicated earlier that the statute contains a requirement for determining
7 implicit subsidies, specifically, that any subsidies in interexchange carrier access
8 rates should be identified before implementing an IUSF. How do you interpret
9 this requirement?

10 A. I believe it means that the IITA must identify such subsidies, if any, that are
11 contained in their interexchange carrier access rates. Such an identification can
12 be made by comparing the current revenues with the "economic cost" of the
13 interexchange carrier access rates. If the current revenues are equal to or less than
14 the economic cost, there clearly would be no such implicit subsidy within those
15 rates. If the current revenue is greater than the "economic cost", there would be
16 concerns as to whether the rates do, in fact, contain a subsidy.

17
18 Q. Have you such an analysis to present?

19 A. Yes, I do. This analysis has been prepared using the same "economic cost"
20 studies that were prepared to develop the economic cost of the supported
21 universal services. As part of the HAI Model output file, there is a "cost detail"
22 tab that includes calculations of IXC switched access rates. The analysis I will
23 present has been developed using the end office switching, ISUP (SS7) signaling,
24 dedicated transport and common transport elements developed in the HAI Model.
25 These rates have been multiplied by actual 2000 intrastate access minutes to

1 develop the economic cost for access and compared to the intrastate access
2 revenues received for those same minutes. The analysis is presented in IITA
3 Exhibit #2, Attachment #6. On an individual company basis, the schedule
4 indicates that a majority of the companies' access rates contain no subsidies.
5 However, for a number of companies, the current revenues are greater than the
6 "economic cost" developed for that company through the HAI model process.
7 While this suggests concern that the rates might contain some subsidies, it does
8 not, by any means, fully demonstrate that. Additional studies to show the stand
9 alone cost of these services would be needed to fully identify whether there are
10 subsidies in these rates. The IITA has not conducted such studies, and believes
11 that they are unnecessary due to the proxy cost provisions of the statute. The
12 Attachment shows that in summary, for all the companies, the economic cost of
13 access, as developed by the HAI Model, are higher than the current access
14 revenues for the companies as a whole. This demonstrates that there is no
15 implicit subsidy, in total, in the access rates of the small Illinois ILECs, thus
16 meeting the statutory test.

17
18 **FUNDING MECHANISM**
19

20 Q. What are the statutory requirements regarding the funding mechanism?

21 A. The statute requires that the funding for the IUSF be recovered from all
22 interexchange carriers and local exchange carriers certificated by the Commission
23 in a competitively neutral manner.
24

1 Q. Does the IITA have a proposed method for assessing the funds against these
2 carriers?

3 A. No. The IITA is aware of the sharp debate that took place in Phase 1 of this
4 proceeding between Ameritech and Verizon, on one hand, and AT&T and the
5 other interexchange carriers, on the other hand, regarding funding methodologies.
6 The IITA believes that these parties can articulate the two major approaches to
7 funding as they did last time and give the Commission information needed to
8 distinguish between these two major methodologies.

9
10 Q. If the Commission gives consideration to the approach proposed by AT&T in the
11 previous phase of this proceeding (a surcharge on end user revenue), are there
12 features of such an approach that the IITA believes are important?

13 A. Yes, the IITA believes that the basis for funding should be the intrastate end user
14 retail revenues of the certificated carriers described in the statute under this
15 general approach. Use of end user retail revenues is much fairer to the end users
16 of the various carriers than the method proposed in the previous phase by
17 MCI/WorldCom, the use of total revenues less payments to other carriers. The
18 IITA would also recommend under this type of approach that the funding be
19 based on current revenue levels rather than prior year levels. The use of current
20 revenues allows the carriers to apply the surcharge level determined by the
21 Commission directly to end user revenues without the necessity of making
22 adjustments to account for changes in revenue levels between the assessment
23 period and the collection period. The IITA would also recommend under this
24 type of approach that the revenue base, against which the assessment is applied,

1 excludes any revenues collected to fund the IUSF. The fund administrator should,
2 as part of its duties, determine the total funding basis from the certificated carriers
3 and an assessment rate to be applied to the funding basis in order to generate the
4 required support funds. This rate should be reviewed and approved by the
5 Commission. As circumstances change, the administrator should propose
6 changes to the assessment rate, as needed, to continue an adequate and
7 appropriate level of funding.

8
9 **FUND ADMINISTRATION**

10
11 Q. Does Section 13-301(d) contain any specifications regarding the fund
12 administrator?

13 A. No, it does not. The IITA believes, though, that it would be appropriate for the
14 administrator of the Section 13-301(d) fund to be a neutral third party
15 administrator as is required in Section 13-301(e). To facilitate initial
16 implementation of the fund in the very short time that will be available, the IITA
17 recommends that the ISCECA be appointed as the initial administrator of the
18 fund.

19
20 **IMPLEMENTATION/TRANSITION ISSUES**

21
22 Q. Does the IITA have concerns regarding the anticipated transition between the
23 current IUSF and DEM Weighting Funds and the new IUSF fund?

24 A. We do. Pursuant to the Commission's Order in Docket No. 98-0679, the DEM
25 Weighting Fund will terminate no later than September 30, 2001. The current
26 procedural schedule in these proceedings anticipates a Commission Order

1 sometime in September, 2001, only a few days before the DEM Weighting Fund
2 terminates. Depending on the decisions made by the Commission in that Order,
3 there will be very little time to effect implementation in order for funding to the
4 new fund recipients to commence in October, 2001.

5
6 Q. What are some of the factors that could impact the ability to implement the Order
7 quickly?

8 A. The funding method chosen would have a significant impact. If a new funding
9 methodology is chosen, it may take time to gather data both in regard to the
10 funding base and to the level of funding required to calculate funding assessment
11 levels. If funding is based on an end user surcharge, it takes time to implement
12 such charges in billing systems, to await the payment of funds to the company and
13 to effectuate payment from the companies to the fund administrator in order for
14 the administrator to have funds available to make disbursements. Depending on
15 the Commission's decisions, these steps will not necessarily be able to be
16 completed in just a few days.

17
18 Q. Have the parties discussed steps that could be taken to alleviate this concern?

19 A. In the workshop held on March 9, 2001, the parties did discuss this concern and
20 agreed to hold a further workshop in June to attempt to address this issue and
21 minimize the problem. The IITA encourages this process and will fully
22 participate in it. However, it may be that the best efforts of the parties can only
23 somewhat shorten the implementation period, not completely eliminate it. If that

1 is the case, there may be other steps necessary in order to avoid a discontinuity of
2 funding.

3
4 Q. Does the IITA have any specific proposals at this time to deal with this potential
5 problem?

6 A. No, it does not. However, the IITA feels that it is important to put the parties and
7 the Commission on notice that this transition problem could occur and to alert
8 them that some type of temporary measures may need to be adopted to address
9 this concern.

10
11 Q. Could you summarize your testimony, please.

12 A. Yes. Pursuant to an Order of Commission, the Illinois DEM Weighting Fund will
13 terminate no later than September 30, 2001. Current recipients of support from
14 this Fund and the current IUSF will experience substantial losses of revenue
15 unless that funding is replaced by the proposed new IUSF. The IITA has
16 presented evidence to support the development of an IUSF under the provisions of
17 Section 13-301(d) of the Act and to meet the requirements imposed by that
18 Section. The IITA respectfully requests that the Commission approve the
19 implementation of an IUSF as proposed so the Fund can be implemented effective
20 October 1, 2001.

21
22 Q. Does this conclude your testimony?

23 A. Yes, it does.

	A	B	C	D
1			IITA Exhibit #2, Attachment #1	
2				
3		Estimate of Current High Cost IUSF Support		
4		Illinois Small Telephone Companies		
5				
6	Company	2000 IUSF Support	Lines	Support Per Line Per Month
7				
8	Adams	\$ 52,356	4,637	\$ 0.94
9	Alhambra	70,752	1,183	4.98
10	Cambridge	22,836	2,066	0.92
11	Cass County	97,200	3,179	2.55
12	Clarksville	4,428	232	1.59
13	C-R	48,408	990	4.07
14	Crossville	12,696	710	1.49
15	Egyptian	65,124	3,178	1.71
16	El Paso	290,520	2,133	11.35
17	FC of Depue	35,544	841	3.52
18	FC of Illinois	170,976	4,814	2.96
19	FC of Lakeside	4,092	894	0.38
20	FC of Midland	220,416	4,629	3.97
21	FC of Mt. Pulaski	27,972	1,947	1.20
22	FC of Orion	0	2,034	-
23	FC of Prairie	4,752	1,100	0.36
24	FC of Schuyler	13,848	3,041	0.38
25	Flat Rock	7,788	604	1.07
26	Geneseo	57,684	9,280	0.52
27	Glasford	11,196	1,363	0.68
28	Grafton	32,700	852	3.20
29	Granview	3,036	-	-
30	Gridley	134,268	1,441	7.76
31	Hamilton	130,308	2,615	4.15
32	Harrisonville	246,984	19,690	1.05
33	Henry County	21,444	1,742	1.03
34	Home	111,216	1,012	9.16
35	Kinsman	16,032	81	16.49
36	LaHarpe	41,496	1,105	3.13
37	Leaf River	89,304	610	12.20
38	Leonore	9,756	158	5.15
39	Madison	150,012	1,599	7.82
40	Marseilles	24,732	4,240	0.49
41	McDonough	69,156	4,466	1.29
42	McNabb	36,276	471	6.42
43	Metamora	77,940	4,228	1.54
44	Mid Century	109,584	4,855	1.88
45	Montrose	50,004	1,654	2.52
46	Moultrie	79,788	853	7.79
47	New Windsor	12,048	642	1.56
48	Odin	93,636	1,146	6.81
49	Oneida	8,472	609	1.16
50	Reynolds	10,452	585	1.49
51	Shawnee	68,700	4,682	1.22
52	Stelle	12,204	102	9.97
53	Tonica	20,004	523	3.19
54	Viola Home	12,000	854	1.17
55	Wabash	65,580	5,269	1.04
56	Woodhull	22,716	874	2.17
57	Yates City	21,564	580	3.10
58				
59	TOTAL	\$ 3,000,000	116,393	\$ 2.15

	A	B	C	D
1			IITA Exhibit #2, Attachment #2	
2				
3		Estimate of Current DEM Support		
4		Illinois Small Telephone Companies		
5				
6	Company	2000 DEM Support	Lines	Support Per Line Per Month
7				
8	Adams	\$ -	4,637	\$ -
9	Alhambra	240,447	1,183	16.94
10	Cambridge	-	2,066	0.00
11	Cass County	418,884	3,179	10.98
12	Clarksville	-	232	0.00
13	C-R	167,453	990	14.10
14	Crossville	-	710	0.00
15	Egyptian	331,827	3,178	8.70
16	El Paso	1,077,789	2,133	42.11
17	FC of Depue	-	841	0.00
18	FC of Illinois	722,637	4,814	12.51
19	FC of Lakeside	79,639	894	7.42
20	FC of Midland	730,409	4,629	13.15
21	FC of Mt. Pulaski	206,627	1,947	8.84
22	FC of Orion	111,476	2,034	4.57
23	FC of Prairie	108,840	1,100	8.25
24	FC of Schuyler	231,609	3,041	6.35
25	Flat Rock	116,081	604	16.02
26	Geneseo	-	9,280	0.00
27	Glasford	-	1,363	0.00
28	Grafton	175,745	852	17.19
29	Granview	-	-	0.00
30	Gridley	452,075	1,441	26.14
31	Hamilton	-	2,615	0.00
32	Harrisonville	816,573	19,690	3.46
33	Henry County	-	1,742	0.00
34	Home	503,600	1,012	41.47
35	Kinsman	-	81	0.00
36	LaHarpe	184,407	1,105	13.91
37	Leaf River	361,238	610	49.35
38	Leonore	-	158	0.00
39	Madison	648,727	1,599	33.81
40	Marseilles	-	4,240	0.00
41	McDonough	-	4,466	0.00
42	McNabb	62,310	471	11.02
43	Metamora	-	4,228	0.00
44	Mid Century	-	4,855	0.00
45	Montrose	265,960	1,654	13.40
46	Moultrie	433,515	853	42.35
47	New Windsor	-	642	0.00
48	Odin	257,349	1,146	18.71
49	Oneida	96,413	609	13.19
50	Reynolds	-	585	0.00
51	Shawnee	609,782	4,682	10.85
52	Stelle	-	102	0.00
53	Tonica	-	523	0.00
54	Viola Home	-	854	0.00
55	Wabash	545,593	5,269	8.63
56	Woodhull	193,193	874	18.42
57	Yates City	235,066	580	33.77
58				
59	TOTAL	\$ 10,385,264	116,393	\$ 7.44

Illinois Independent Telephone Association
Proposed Default Input Changes
HAI Model 5.0a

1. Plant type assumptions - the HAI default assumes varying levels of buried, aerial, and underground plant in the different density zones. Because of the high predominance of buried plant construction in rural Illinois areas, the model default inputs have been modified for drops, distribution plant, and feeder plant to reflect a much larger percentage of buried plant and a smaller percentage of aerial plant than the default.
2. Fraction of buried plant available for shift - These fractions allow a portion of buried plant that has been identified using the normal plant algorithms to be shifted to aerial plant on a least-cost basis. These percentages have all been set to zero so the constructed plant is unchanged from the plant type assumptions provided for each density zone.
3. Structure sharing assumptions - Model default inputs assumes a significant portion of the cost of structures (pole lines, trenches for buried cable, trenches & conduit for underground cable) will be assigned to users other than the telephone company. These assumptions vary based on cable type and density zone and range from 100% to 25%. The IITA has assumed much less structure sharing than is assumed in the default inputs.
4. End Office switching investment, small ICO - Based on analysis of model results to actual investment data, the IITA has increased the default constant COE switching investment term from \$416.11 per line to \$658.25 per line.
5. Tandem routed fraction of total interLATA and intraLATA traffic - Default assumptions for these factors have been increased from 20% to 90% to reflect the amount of traffic switched through tandem switches for the small Illinois companies.
6. The Total Interoffice Fraction Percentage has been changed from a default value of 65% to 45% to more accurately reflect traffic patterns of rural carriers.
7. Inputs for calculating the cost of capital have been revised to reflect a 40% debt ratio for the companies, a 9% cost of debt, and a 15% cost of equity for all the small companies except the Frontier companies where a 13.8% cost of equity has been assumed.
8. The forward looking network operations expense factor has been increased from the default 50% of current expense levels to 100% of current expense levels.
9. The monthly cost of local number portability has been decreased from a default level of \$.25 per line to zero.

1 10. Billing/Billing Inquiry per line per month. Changed from default value of \$1.22 to \$3.62 to
2 reflect Illinois costs of providing such services.

3
4 11. Carrier to Carrier Customer Service cost per year has been changed from a default value of
5 \$1.69 per line per year to \$16.83 per line per year to reflect cost levels experienced by the small
6 Illinois companies.

7
8 12. The alternative central office switching and central office transmission expense factors have
9 been changed from their default values of 2.69% and 1.53% respectively to 7.0% and 7.5 %
10 respectively to reflect costs experienced by small Illinois companies.

11
12

	A	B	C	D
1				
2	<i>NOTE: This sheet displays all user adjustable inputs which vary from HM 5.0a default settings</i>			
3				
4	Workfile Name:	C:\Program Files\HM50\WORKFILES\HMWKIL3409849999.XLS		
5	Distribution Module Name:	C:\Program Files\HM50\MODULES\IR50a_distribution.xls		
6	Feeder Module Name:	C:\Program Files\HM50\MODULES\IR50a_feeder.xls		
7	Switching Module Name:	C:\Program Files\HM50\MODULES\IR50a_switching_io.xls		
8	Expense Module Name:	C:\Program Files\HM50\MODULES\IR50a_expense_density.xls		
9				
10	Module/Table	Scenario Input	Scenario Value	Default Value
11	Distribution	Buried Fraction - 0	0.95	0.75
12	Distribution	Buried Fraction - 5	0.95	0.75
13	Distribution	Buried Fraction - 100	0.95	0.75
14	Distribution	Buried Fraction - 200	0.95	0.7
15	Distribution	Buried Fraction - 650	0.85	0.7
16	Distribution	Buried Fraction - 850	0.85	0.7
17	Distribution	Buried Fraction - 2550	0.85	0.65
18	Distribution	Aerial Cable Fraction - 0	0.05	0.25
19	Distribution	Aerial Cable Fraction - 5	0.05	0.25
20	Distribution	Aerial Cable Fraction - 100	0.05	0.25
21	Distribution	Aerial Cable Fraction - 200	0.05	0.3
22	Distribution	Aerial Cable Fraction - 650	0.05	0.3
23	Distribution	Aerial Cable Fraction - 850	0.05	0.3
24	Distribution	Aerial Cable Fraction - 2550	0.05	0.3
25	Distribution	Buried Drop Sharing Fraction - 0	1	0.5
26	Distribution	Buried Drop Sharing Fraction - 5	1	0.5
27	Distribution	Buried Drop Sharing Fraction - 100	1	0.5
28	Distribution	Buried Drop Sharing Fraction - 200	1	0.5
29	Distribution	Buried Drop Sharing Fraction - 650	1	0.5
30	Distribution	Buried Drop Sharing Fraction - 850	1	0.5
31	Distribution	Buried Drop Sharing Fraction - 2550	1	0.5
32	Distribution	Buried Drop Sharing Fraction - 5000	1	0.5
33	Distribution	Buried Drop Sharing Fraction - 10000	1	0.5
34	Distribution	Buried Drop Fraction - 0	0.95	0.75
35	Distribution	Buried Drop Fraction - 5	0.95	0.75
36	Distribution	Buried Drop Fraction - 100	0.95	0.75

A		B		C	D
Module/Label	Scenario Input	Scenario Value	Default Value		
10	Distribution	Buried Drop Fraction - 200	0.95	0.7	
37	Distribution	Buried Drop Fraction - 650	0.95	0.7	
38	Distribution	Buried Drop Fraction - 850	0.95	0.7	
39	Distribution	Buried Drop Fraction - 2550	0.95	0.7	
40	Distribution	Buried fraction available for shift - 0	0	0.75	
41	Distribution	Buried fraction available for shift - 5	0	0.75	
42	Distribution	Buried fraction available for shift - 100	0	0.75	
43	Distribution	Buried fraction available for shift - 200	0	0.75	
44	Distribution	Buried fraction available for shift - 650	0	0.75	
45	Distribution	Buried fraction available for shift - 850	0	0.75	
46	Distribution	Buried fraction available for shift - 2550	0	0.75	
47	Feeder	Copper Aerial Fraction - 0	0.05	0.5	
48	Feeder	Copper Aerial Fraction - 5	0.05	0.5	
49	Feeder	Copper Aerial Fraction - 100	0.05	0.5	
50	Feeder	Copper Aerial Fraction - 200	0.05	0.4	
51	Feeder	Copper Aerial Fraction - 650	0.05	0.3	
52	Feeder	Copper Aerial Fraction - 850	0.05	0.2	
53	Feeder	Copper Aerial Fraction - 2550	0.05	0.15	
54	Feeder	Copper Buried Fraction - 0	0.95	0.45	
55	Feeder	Copper Buried Fraction - 5	0.95	0.45	
56	Feeder	Copper Buried Fraction - 100	0.95	0.45	
57	Feeder	Copper Buried Fraction - 200	0.95	0.4	
58	Feeder	Copper Buried Fraction - 650	0.85	0.3	
59	Feeder	Copper Buried Fraction - 850	0.85	0.2	
60	Feeder	Copper Buried Fraction - 2550	0.85	0.1	
61	Feeder	Fiber Aerial Fraction - 0	0.05	0.35	
62	Feeder	Fiber Aerial Fraction - 5	0.05	0.35	
63	Feeder	Fiber Aerial Fraction - 100	0.05	0.35	
64	Feeder	Fiber Aerial Fraction - 200	0.05	0.3	
65	Feeder	Fiber Aerial Fraction - 650	0.05	0.3	
66	Feeder	Fiber Aerial Fraction - 850	0.05	0.2	
67	Feeder	Fiber Aerial Fraction - 2550	0.05	0.15	
68	Feeder	Fiber Buried Fraction - 0	0.95	0.6	
69	Feeder	Fiber Buried Fraction - 5	0.95	0.6	
70	Feeder	Fiber Buried Fraction - 100	0.95	0.6	
71	Feeder		0.95	0.6	

A		B		C		D	
Module/Tab		Scenario Input		Scenario Value		Default Value	
10	Feeder	Fiber Buried Fraction - 200		0.95		0.6	
72	Feeder	Fiber Buried Fraction - 650		0.85		0.3	
73	Feeder	Fiber Buried Fraction - 850		0.85		0.2	
74	Feeder	Fiber Buried Fraction - 2550		0.85		0.1	
75	Feeder	Buried fraction available for shift - 0		0		0.75	
76	Feeder	Buried fraction available for shift - 5		0		0.75	
77	Feeder	Buried fraction available for shift - 100		0		0.75	
78	Feeder	Buried fraction available for shift - 200		0		0.75	
79	Feeder	Buried fraction available for shift - 650		0		0.75	
80	Feeder	Buried fraction available for shift - 850		0		0.75	
81	Feeder	Buried fraction available for shift - 2550		0		0.75	
82	Feeder	Constant EO Switching Investment Term, small ICO		658.25		416.11	
83	Switching	Total Interoffice Traffic Fraction		0.45		0.65	
84	Switching	Tandem-routed Fraction of Total IntralATA Traffic		0.9		0.2	
85	Switching	Tandem-routed Fraction of Total InterLATA Traffic		0.9		0.2	
86	Switching	Local Call Attempts		8149		0	
87	Switching	Call Completion Factor		0.7		0	
88	Switching	IntralATA Calls Completed		487		0	
89	Switching	InterLATA intrastate Calls Completed		491		0	
90	Switching	InterLATA interstate Calls Completed		1043		0	
91	Switching	Local DEMs, thousands		35965		0	
92	Switching	Intrastate DEMs, thousands		7679		0	
93	Switching	Interstate DEMs, thousands		7581		0	
94	Switching	Fiber Investment, buried fraction		0.9		0.6	
95	Switching	Fiber, aerial fraction		0.05		0.2	
96	Switching	Fraction of Aerial Structure Assigned to Telephone		0.5		0.33	
97	Switching	Fraction of Buried Structure Assigned to Telephone		1		0.33	
98	Switching	Fraction of Underground Structure Assigned to Telephone		1		0.33	
99	Switching	Cost of Debt		0.09		0.077	
100	Expense	Debt Fraction		0.4		0.45	
101	Expense	Cost of Equity		0.15		0.119	
102	Expense	Billing/Bill Inquiry per line per month		3.62		1.22	
103	Expense	Forward-looking Network Operations Factor		1		0.5	
104	Expense	Alternative CO Switching Factor		0.07		0.0269	
105	Expense	Alternative Circuit Equipment Factor		0.075		0.0153	
106	Expense						

A	B	C	D
Module/Label	Scenario Input	Scenario Value	Default Value
10 Expense	Monthly LNP cost, per line	0	0.25
107 Expense	Carrier to Carrier Customer Service, per line per year	16.83	1.69
108 Expense	Distribution Aerial Shring Fraction - 0	1	0.5
109 Expense	Distribution Aerial Shring Fraction - 5	1	0.33
110 Expense	Distribution Aerial Shring Fraction - 100	1	0.25
111 Expense	Distribution Aerial Shring Fraction - 200	0.5	0.25
112 Expense	Distribution Aerial Shring Fraction - 650	0.5	0.25
113 Expense	Distribution Aerial Shring Fraction - 850	0.5	0.25
114 Expense	Distribution Aerial Shring Fraction - 2550	0.5	0.25
115 Expense	Distribution Aerial Shring Fraction - 0	1	0.33
116 Expense	Distribution Buried Shring Fraction - 0	1	0.33
117 Expense	Distribution Buried Shring Fraction - 5	1	0.33
118 Expense	Distribution Buried Shring Fraction - 100	1	0.33
119 Expense	Distribution Buried Shring Fraction - 200	1	0.33
120 Expense	Distribution Buried Shring Fraction - 650	1	0.33
121 Expense	Distribution Buried Shring Fraction - 850	1	0.33
122 Expense	Distribution Buried Shring Fraction - 2550	1	0.33
123 Expense	Distribution Underground Shring Fraction - 5	1	0.5
124 Expense	Distribution Underground Shring Fraction - 100	1	0.5
125 Expense	Distribution Underground Shring Fraction - 200	1	0.4
126 Expense	Distribution Underground Shring Fraction - 650	1	0.33
127 Expense	Distribution Underground Shring Fraction - 850	1	0.33
128 Expense	Distribution Underground Shring Fraction - 2550	1	0.5
129 Expense	Feeder Aerial Shring Fraction - 0	1	0.33
130 Expense	Feeder Aerial Shring Fraction - 5	1	0.25
131 Expense	Feeder Aerial Shring Fraction - 100	1	0.25
132 Expense	Feeder Aerial Shring Fraction - 200	0.5	0.25
133 Expense	Feeder Aerial Shring Fraction - 650	0.5	0.25
134 Expense	Feeder Aerial Shring Fraction - 850	0.5	0.25
135 Expense	Feeder Aerial Shring Fraction - 2550	1	0.5
136 Expense	Feeder Underground Shring Fraction - 0	1	0.5
137 Expense	Feeder Underground Shring Fraction - 5	1	0.4
138 Expense	Feeder Underground Shring Fraction - 100	1	0.33
139 Expense	Feeder Underground Shring Fraction - 200	1	0.33
140 Expense	Feeder Underground Shring Fraction - 650	1	0.33
141 Expense	Feeder Underground Shring Fraction - 850	1	0.33

	A	B	C	D
10	Module Table	Scenario Input	Scenario Value	Default Value
142	Expense	Feeder Underground Shring Fraction - 2550	1	0.33
143	Expense	Feeder Buried Shring Fraction - 0	1	0.4
144	Expense	Feeder Buried Shring Fraction - 5	1	0.4
145	Expense	Feeder Buried Shring Fraction - 100	1	0.4
146	Expense	Feeder Buried Shring Fraction - 200	1	0.4
147	Expense	Feeder Buried Shring Fraction - 650	1	0.4
148	Expense	Feeder Buried Shring Fraction - 850	1	0.4
149	Expense	Feeder Buried Shring Fraction - 2550	1	0.4

	A	B	C	D	E	F	G	H
1							IITA Exhibit #2, Attachment 5	
2								
3			Calculation of Illinois Supportable USF Requirement					
4								
5	Company	HAI USF Cost	Proposed Affordable Rate	Economic Cost Over Affordable Rate	Access Lines	Potential Support	Federal Support Funds	IUSF Eligibility Amount-Individual Company Determination
6	Adams	\$ 125.87	\$ 12.62	\$ 113.25	4,637	\$ 6,301,894	\$ 1,073,589	\$ 5,228,305
7	Alhambra	104.35	17.14	87.20	1,183	1,237,901	287,398	950,503
8	Cambridge	73.90	17.31	56.59	2,066	1,403,041	201,768	1,201,273
9	Cass County	89.73	20.69	69.04	3,179	2,633,758	725,570	1,908,188
10	Clarksville	273.89	15.05	258.85	232	720,629	65,778	654,851
11	C-R	125.56	19.77	105.79	990	1,256,746	837,659	419,087
12	Crossville	116.23	16.35	99.88	710	850,947	146,372	704,575
13	Egyptian	121.26	13.46	107.80	3,178	4,111,024	1,639,776	2,471,248
14	El Paso	78.15	20.89	57.26	2,133	1,465,689	589,835	875,854
15	FC of Depue	70.08	22.10	47.98	841	484,242	170,564	313,678
16	FC of Illinois	88.90	19.44	69.45	4,814	4,012,109	261,777	3,750,332
17	FC of Lakeside	129.48	26.14	103.34	894	1,108,655	435,415	673,240
18	FC of Midland	123.30	20.06	103.24	4,629	5,734,674	351,449	5,383,225
19	FC of Mt. Pulaski	88.70	18.34	70.36	1,947	1,643,851	764,041	879,810
20	FC of Orion	62.68	20.43	42.25	2,034	1,031,209	385,126	646,083
21	FC of Prairie	106.42	20.20	86.21	1,100	1,138,037	164,771	973,266
22	FC of Schuyler	72.93	20.57	52.37	3,041	1,910,921	198,134	1,712,787
23	Fiat Rock	156.27	21.61	134.65	604	975,956	238,534	737,422
24	Geneseo	47.76	13.29	34.47	9,280	3,838,328	525,312	3,313,016
25	Glasford	73.61	4.03	69.58	1,363	1,137,983	207,423	930,560
26	Grafton	85.19	19.61	65.58	852	670,529	486,135	184,394
28	Gridley	75.59	21.90	53.70	1,441	928,506	606,285	322,221
29	Hamilton	164.21	18.70	145.51	2,615	4,566,129	577,021	3,989,108
30	Harrisonville	56.53	19.18	37.35	19,690	8,824,158	5,359,140	3,465,018
31	Henry County	85.12	17.95	67.16	1,742	1,403,988	181,212	1,222,776
32	Home	71.30	21.75	49.55	1,012	601,687	1,236,154	(634,467)
33	Kinsman	173.85	4.00	169.85	81	165,097	42,430	122,667
34	LaHarpe	101.11	20.45	80.66	1,105	1,069,525	686,495	383,030
35	Leaf River	106.57	25.59	80.98	610	592,794	616,946	(24,152)
36	Leonore	168.64	11.66	156.99	158	297,647	61,195	236,452
37	Madison	88.74	20.25	68.49	1,599	1,314,202	1,782,539	(468,337)
38	Marseilles	47.95	13.40	34.55	4,240	1,757,665	744,705	1,012,960
39	McDonough	138.28	19.72	118.56	4,466	6,353,747	1,067,235	5,286,512
40	McNabb	107.11	19.39	87.73	471	495,833	227,575	268,258
41	Metamora	63.73	21.51	42.22	4,228	2,141,823	707,906	1,433,917
42	Mid Century	135.46	15.31	120.15	4,855	6,999,819	1,006,944	5,992,875
43	Montrose	155.62	17.98	137.64	1,654	2,731,936	284,395	2,447,541
44	Moultrie	74.53	20.19	54.34	853	556,211	598,212	(42,001)
45	New Windsor	77.17	15.69	61.48	642	473,616	125,887	347,729
46	Odin	86.53	20.51	66.02	1,146	907,950	786,299	121,651
47	Oneida	81.30	12.13	69.17	609	505,508	125,564	379,944
48	Reynolds	92.82	14.08	78.74	585	552,782	124,408	428,374
49	Shawnee	138.39	18.37	120.01	4,682	6,742,862	1,066,760	5,676,102
50	Stelle	200.87	5.12	195.75	102	239,600	42,559	197,041
51	Tonica	88.65	31.20	57.45	523	360,527	108,406	252,121
52	Viola Home	84.70	12.62	72.08	854	738,680	152,744	585,936
53	Wabash	122.76	18.98	103.78	5,269	6,561,835	779,964	5,781,871
54	Woodhull	92.61	14.41	78.20	874	820,171	238,610	581,561
55	Yates City	106.69	22.89	83.79	580	583,194	283,062	300,132
56								
57	Total Small Companies	\$ 91.67	\$ 17.96	\$ 73.71	116,393	\$ 102,955,615	\$ 29,377,078	\$ 73,578,537

	A	B	C	D	E	F
1					IITA Exhibit #2, Attachment 6	
2						
3	Comparison of Access Cost to Access Revenue					
4						
5	Company Name	HAI Rate	Actual Rate	HAI Revenue	Actual Revenue	Actual over HAI
6	Adams	\$ 0.06144	\$ 0.06315	\$ 1,156,425	\$ 1,188,609	\$ 32,184
7	Alhambra	0.04908	0.03699	352,647	265,767	(86,879)
8	Cambridge	0.05253	0.04566	288,018	250,368	(37,650)
9	Cass County	0.04972	0.02724	616,166	337,565	(278,601)
10	Clarksville	0.28407	0.07434	176,225	46,117	(130,108)
11	C-R	0.08535	0.05600	489,816	321,419	(168,397)
12	Crossville	0.13581	0.05418	15,985	6,377	(9,608)
13	Egyptian	0.10362	0.05410	1,996,213	1,042,238	(953,975)
14	El Paso	0.05881	0.03427	664,453	387,219	(277,233)
15	FC of Depue	0.05794	0.04222	217,948	158,793	(59,155)
16	FC of Illinois	0.07945	0.01157	2,399,717	349,414	(2,050,303)
17	FC of Lakeside	0.14930	0.01157	549,317	42,561	(506,756)
18	FC of Midland	0.10763	0.01157	3,870,847	416,021	(3,454,826)
19	FC of Mt. Pulaski	0.06227	0.01157	486,963	90,462	(396,501)
20	FC of Orion	0.03473	0.01157	197,996	65,943	(132,053)
21	FC of Prairie	0.10504	0.01157	499,133	54,969	(444,164)
22	FC of Schuyler	0.02651	0.01157	271,957	118,688	(153,269)
23	Flat Rock	0.33836	0.04186	827,567	102,393	(725,175)
24	Geneseo	0.02748	0.03119	737,555	837,184	99,629
25	Glasford	0.04002	0.03829	219,775	210,295	(9,480)
26	Grafton	0.03461	0.04018	160,653	186,481	25,828
28	Gridley	0.06602	0.03880	395,633	232,485	(163,148)
29	Hamilton	0.15635	0.03426	2,561,389	561,180	(2,000,209)
30	Harrisonville	0.03195	0.01159	2,179,548	790,887	(1,388,661)
31	Henry County	0.08573	0.05109	367,708	219,112	(148,596)
32	Home	0.03493	0.05850	218,186	365,452	147,267
33	Kinsman	0.08973	0.10253	72,537	82,882	10,345
34	LaHarpe	0.14520	0.04772	423,255	139,096	(284,159)
35	Leaf River	0.09834	0.11240	270,065	308,670	38,605
36	Leonore	0.12680	0.08374	92,611	61,164	(31,447)
37	Madison	0.06598	0.09550	864,601	1,251,337	386,736
38	Marseilles	0.02110	0.02564	436,754	530,569	93,815
39	McDonough	0.16608	0.04064	1,974,422	483,134	(1,491,288)
40	McNabb	0.06635	0.04465	176,914	119,049	(57,865)
41	Metamora	0.02853	0.02907	597,275	608,668	11,393
42	Mid Century	0.11610	0.04720	2,198,336	893,773	(1,304,563)
43	Montrose	0.21858	0.04462	1,789,989	365,365	(1,424,624)
44	Moultrie	0.06157	0.09744	387,893	613,892	225,999
45	New Windsor	0.06890	0.04820	171,679	120,098	(51,581)
46	Odin	0.05002	0.05587	288,932	322,726	33,794
47	Oneida	0.14072	0.05767	271,826	111,406	(160,420)
48	Reynolds	0.04785	0.05100	131,191	139,828	8,637
49	Shawnee	0.22307	0.04644	3,532,766	735,459	(2,797,308)
50	Stelle	0.13415	0.29407	18,416	40,370	21,954
51	Tonica	0.04510	0.04791	141,069	149,867	8,798
52	Viola Home	0.06743	0.04829	215,715	154,499	(61,216)
53	Wabash	0.05659	0.03154	1,123,115	625,884	(497,231)
54	Woodhull	0.08957	0.05352	244,749	146,232	(98,518)
55	Yates City	0.05110	0.05036	130,241	128,356	(1,885)
56						
57	Total Small Companies	\$ 0.07587	\$ 0.03398	\$ 37,472,191	\$ 16,780,322	\$ (20,691,869)

	A	B	C	D
1			IIITA Exhibit #2, Attachment #1	
2				REVISED
3		Estimate of Current High Cost IUSF Support		
4		Illinois Small Telephone Companies		
5				
6	Company	2000 IUSF Support	Lines	Support Per Line Per Month
7				
8	Adams	\$ 52,356	4,637	\$ 0.94
9	Alhambra	70,752	1,183	4.98
10	Cambridge	22,836	2,066	0.92
11	Cass County	97,200	3,179	2.55
12	Clarksville	4,428	232	1.59
13	C-R	48,408	990	4.07
14	Crossville	12,696	710	1.49
15	Egyptian	290,520	3,178	7.62
16	El Paso	65,124	2,133	2.54
17	FC of Depue	35,544	841	3.52
18	FC of Illinois	170,976	4,814	2.96
19	FC of Lakeside	4,092	894	0.38
20	FC of Midland	220,416	4,629	3.97
21	FC of Mt. Pulaski	27,972	1,947	1.20
22	FC of Orion	0	2,034	-
23	FC of Prairie	4,752	1,100	0.36
24	FC of Schuyler	13,848	3,041	0.38
25	Flat Rock	7,788	604	1.07
26	Geneseo	57,684	9,280	0.52
27	Glasford	11,196	1,363	0.68
28	Grafton	32,700	852	3.20
29	Grandview	3,036	-	-
30	Gridley	134,268	1,441	7.76
31	Hamilton	130,308	2,615	4.15
32	Harrisonville	246,984	19,478	1.06
33	Henry County	21,444	1,742	1.03
34	Home	111,216	1,012	9.16
35	Kinsman	16,032	81	16.49
36	LaHarpe	41,496	1,105	3.13
37	Leaf River	89,304	610	12.20
38	Leonore	9,756	158	5.15
39	Madison	150,012	1,599	7.82
40	Marseilles	24,732	4,240	0.49
41	McDonough	69,156	4,466	1.29
42	McNabb	36,276	471	6.42
43	Metamora	77,940	4,228	1.54
44	Mid Century	109,584	4,855	1.88
45	Montrose	50,004	1,654	2.52
46	Moultrie	79,788	853	7.79
47	New Windsor	12,048	642	1.56
48	Odin	93,636	1,146	6.81
49	Oneida	8,472	609	1.16
50	Reynolds	10,452	585	1.49
51	Shawnee	68,700	4,682	1.22
52	Stelle	12,204	102	9.97
53	Tonica	20,004	523	3.19
54	Viola Home	12,000	854	1.17
55	Wabash	65,580	5,269	1.04
56	Woodhull	22,716	754	2.51
57	Yates City	21,564	580	3.10
58				
59	TOTAL	\$ 3,000,000	116,061	\$ 2.15

	A	B	C	D
1			IIITA Exhibit #2, Attachment #2	
2				REVISED
3		Estimate of Current DEM Support		
4		Illinois Small Telephone Companies		
5				
6	Company	2000 DEM Support	Lines	Support Per Line Per Month
7				
8	Adams	\$ -	4,637	\$ -
9	Alhambra	240,447	1,183	16.94
10	Cambridge	-	2,066	0.00
11	Cass County	418,884	3,179	10.98
12	Clarksville	-	232	0.00
13	C-R	167,453	990	14.10
14	Crossville	-	710	0.00
15	Egyptian	1,077,789	3,178	28.26
16	El Paso	331,827	2,133	12.96
17	FC of Depue	-	841	0.00
18	FC of Illinois	722,637	4,814	12.51
19	FC of Lakeside	79,639	894	7.42
20	FC of Midland	730,409	4,629	13.15
21	FC of Mt. Pulaski	206,627	1,947	8.84
22	FC of Orion	111,476	2,034	4.57
23	FC of Prairie	108,840	1,100	8.25
24	FC of Schuyler	231,609	3,041	6.35
25	Flat Rock	116,081	604	16.02
26	Geneseo	-	9,280	0.00
27	Glasford	-	1,363	0.00
28	Grafton	175,745	852	17.19
29	Granview	-	-	0.00
30	Gridley	452,075	1,441	26.14
31	Hamilton	-	2,615	0.00
32	Harrisonville	816,573	19,478	3.49
33	Henry County	-	1,742	0.00
34	Home	503,600	1,012	41.47
35	Kinsman	-	81	0.00
36	LaHarpe	184,407	1,105	13.91
37	Leaf River	361,238	610	49.35
38	Leonore	-	158	0.00
39	Madison	648,727	1,599	33.81
40	Marseilles	-	4,240	0.00
41	McDonough	-	4,466	0.00
42	McNabb	62,310	471	11.02
43	Metamora	-	4,228	0.00
44	Mid Century	-	4,855	0.00
45	Montrose	265,960	1,654	13.40
46	Moultrie	433,515	853	42.35
47	New Windsor	-	642	0.00
48	Odin	257,349	1,146	18.71
49	Oneida	96,413	609	13.19
50	Reynolds	-	585	0.00
51	Shawnee	609,782	4,682	10.85
52	Stelle	-	102	0.00
53	Tonica	-	523	0.00
54	Viola Home	-	854	0.00
55	Wabash	545,593	5,269	8.63
56	Woodhull	193,193	754	21.35
57	Yates City	235,066	580	33.77
58				
59	TOTAL	\$ 10,385,264	116,061	\$ 7.46

	A	B	C	D	E	H	I	J
1							IITA Exhibit #2, Attachment 5	
2								REVISED
3			Calculation of Illinois Supportable USF Requirement					
4								
5	Company	HAI USF Cost	Proposed Affordable Rate	Economic Cost Over Affordable Rate	Access Lines	Potential Support	Federal Support Funds	IUSF Eligibility Amount-Individual Company Determination
6	Adams	\$ 125.87	\$ 12.62	\$ 113.25	4,637	\$ 6,301,894	\$ 1,073,589	\$ 5,228,305
7	Alhambra	104.35	17.14	87.20	1,183	1,237,901	287,398	950,503
8	Cambridge	73.90	17.31	56.59	2,066	1,403,041	201,768	1,201,273
9	Cass County	89.73	20.69	69.04	3,179	2,633,758	725,570	1,908,188
10	Clarksville	273.89	15.05	258.85	232	720,629	65,778	654,851
11	C-R	125.56	19.77	105.79	990	1,256,746	837,659	419,087
12	Crossville	116.23	16.35	99.88	710	850,947	146,372	704,575
13	Egyptian	121.26	13.46	107.80	3,178	4,111,024	1,639,776	2,471,248
14	El Paso	78.15	20.89	57.26	2,133	1,465,689	589,835	875,854
15	FC of Depue	70.08	22.10	47.98	841	484,242	170,564	313,678
16	FC of Illinois	88.90	19.44	69.45	4,814	4,012,109	261,777	3,750,332
17	FC of Lakeside	129.48	26.14	103.34	894	1,108,655	435,415	673,240
18	FC of Midland	123.30	20.06	103.24	4,629	5,734,674	351,449	5,383,225
19	FC of Mt. Pulaski	88.70	18.34	70.36	1,947	1,643,851	764,041	879,810
20	FC of Orion	62.68	20.43	42.25	2,034	1,031,209	385,126	646,083
21	FC of Prairie	106.42	20.20	86.21	1,100	1,138,037	164,771	973,266
22	FC of Schuyler	72.93	20.57	52.37	3,041	1,910,921	198,134	1,712,787
23	Flat Rock	156.27	21.61	134.65	604	975,956	238,534	737,422
24	Geneseo	47.76	13.29	34.47	9,280	3,838,328	525,312	3,313,016
25	Glasford	73.61	4.03	69.58	1,363	1,137,983	207,423	930,560
26	Grafton	85.19	19.61	65.58	852	670,529	486,135	184,394
28	Gridley	75.59	21.90	53.70	1,441	928,506	606,285	322,221
29	Hamilton	164.21	18.70	145.51	2,615	4,566,129	577,021	3,989,108
30	Harrisonville	56.53	19.32	37.21	19,478	8,696,670	5,359,140	3,337,530
31	Henry County	85.12	17.95	67.16	1,742	1,403,988	181,212	1,222,776
32	Home	71.30	21.75	49.55	1,012	601,687	1,236,154	(634,467)
33	Kinsman	173.85	4.00	169.85	81	165,097	42,430	122,667
34	LaHarpe	101.11	20.45	80.66	1,105	1,069,525	686,495	383,030
35	Leaf River	106.57	25.59	80.98	610	592,794	616,946	(24,152)
36	Leonore	168.64	11.66	156.99	158	297,647	61,195	236,452
37	Madison	88.74	20.25	68.49	1,599	1,314,202	1,782,539	(468,337)
38	Marseilles	47.95	13.40	34.55	4,240	1,757,665	744,705	1,012,960
39	McDonough	138.28	19.72	118.56	4,466	6,353,747	1,067,235	5,286,512
40	McNabb	107.11	19.39	87.73	471	495,833	227,575	268,258
41	Metamora	63.73	21.51	42.22	4,228	2,141,823	707,906	1,433,917
42	Mid Century	135.46	15.31	120.15	4,855	6,999,819	1,006,944	5,992,875
43	Montrose	155.62	17.98	137.64	1,654	2,731,936	284,395	2,447,541
44	Moultrie	74.53	20.19	54.34	853	556,211	458,998	97,213
45	New Windsor	77.17	15.69	61.48	642	473,616	125,887	347,729
46	Odin	86.53	20.51	66.02	1,146	907,950	786,299	121,651
47	Oneida	81.30	12.13	69.17	609	505,508	125,564	379,944
48	Reynolds	92.82	14.08	78.74	585	552,782	124,408	428,374
49	Shawnee	138.39	18.37	120.01	4,682	6,742,862	1,066,760	5,676,102
50	Stelle	200.87	5.12	195.75	102	239,600	42,559	197,041
51	Tonica	88.65	31.20	57.45	523	360,527	108,406	252,121
52	Viola Home	84.70	12.62	72.08	854	738,680	152,744	585,936
53	Wabash	122.76	18.98	103.78	5,269	6,561,835	779,964	5,781,871
54	Woodhull	92.61	14.21	78.40	754	709,390	238,610	470,780
55	Yates City	106.69	22.89	83.79	580	583,194	283,062	300,132
56								
57	Total Small Companies	\$ 91.74	\$ 17.98	\$ 73.75	116,061	\$ 102,717,346	\$ 29,237,864	\$ 73,479,482

	A	B	C	D	E	F
1					IITA Exhibit #2, Attachment 6	
2						REVISED
3	Comparison of Access Cost to Access Revenue					
4						
5	Company Name	HAI Rate	Actual Rate	HAI Revenue	Actual Revenue	Actual over HAI
6	Adams	\$ 0.06144	\$ 0.06315	\$ 1,156,425	\$ 1,188,609	\$ 32,184
7	Alhambra	0.04908	0.03699	352,647	265,767	(86,879)
8	Cambridge	0.05253	0.04566	288,018	250,368	(37,650)
9	Cass County	0.04972	0.02724	616,166	337,565	(278,601)
10	Clarksville	0.28407	0.07434	176,225	46,117	(130,108)
11	C-R	0.08535	0.05600	489,816	321,419	(168,397)
12	Crossville	0.13581	0.05418	295,048	117,702	(177,346)
13	Egyptian	0.10362	0.05410	1,996,213	1,042,238	(953,975)
14	El Paso	0.05881	0.03427	664,453	387,219	(277,233)
15	FC of Depue	0.05794	0.04222	217,948	158,793	(59,155)
16	FC of Illinois	0.07945	0.01157	2,399,717	349,414	(2,050,303)
17	FC of Lakeside	0.14930	0.01157	549,317	42,561	(506,756)
18	FC of Midland	0.10763	0.01157	3,870,847	416,021	(3,454,826)
19	FC of Mt. Pulaski	0.06227	0.01157	486,963	90,462	(396,501)
20	FC of Orion	0.03473	0.01157	197,996	65,943	(132,053)
21	FC of Prairie	0.10504	0.01157	499,133	54,969	(444,164)
22	FC of Schuyler	0.02651	0.01157	271,957	118,688	(153,269)
23	Flat Rock	0.33836	0.04186	827,567	102,393	(725,175)
24	Geneseo	0.02748	0.03119	737,555	837,184	99,629
25	Glasford	0.04002	0.03829	219,775	210,295	(9,480)
26	Grafton	0.03461	0.04018	160,653	186,481	25,828
28	Gridley	0.06602	0.03880	395,633	232,485	(163,148)
29	Hamilton	0.15635	0.03426	2,561,389	561,180	(2,000,209)
30	Harrisonville	0.03195	0.01159	2,179,548	790,887	(1,388,661)
31	Henry County	0.08573	0.05109	367,708	219,112	(148,596)
32	Home	0.03493	0.05850	218,186	365,452	147,267
33	Kinsman	0.08973	0.10253	72,537	82,882	10,345
34	LaHarpe	0.14520	0.04772	423,255	139,096	(284,159)
35	Leaf River	0.09834	0.11240	270,065	308,670	38,605
36	Leonore	0.12680	0.08374	92,611	61,164	(31,447)
37	Madison	0.06598	0.09550	864,601	1,251,337	386,736
38	Marseilles	0.02110	0.02564	436,754	530,569	93,815
39	McDonough	0.16608	0.04064	1,974,422	483,134	(1,491,288)
40	McNabb	0.06635	0.04465	176,914	119,049	(57,865)
41	Metamora	0.02853	0.02907	597,275	608,668	11,393
42	Mid Century	0.11610	0.04720	2,198,336	893,773	(1,304,563)
43	Montrose	0.21858	0.04462	1,789,989	365,365	(1,424,624)
44	Moultrie	0.06157	0.09744	261,322	413,576	152,254
45	New Windsor	0.06890	0.04820	171,679	120,098	(51,581)
46	Odin	0.05002	0.05587	288,932	322,726	33,794
47	Oneida	0.14072	0.05767	271,826	111,406	(160,420)
48	Reynolds	0.04785	0.05100	131,191	139,828	8,637
49	Shawnee	0.22307	0.04644	3,532,766	735,459	(2,797,308)
50	Stelle	0.13415	0.29407	18,416	40,370	21,954
51	Tonica	0.04510	0.04791	141,069	149,867	8,798
52	Viola Home	0.06743	0.04829	215,715	154,499	(61,216)
53	Wabash	0.05659	0.03154	1,123,115	625,884	(497,231)
54	Woodhull	0.08957	0.05352	244,749	146,232	(98,518)
55	Yates City	0.05110	0.05036	130,241	128,356	(1,885)
56						
57	Total Small Companies	\$ 0.07618	\$ 0.03380	\$ 37,624,682	\$ 16,691,332	\$ (20,933,351)